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DAVIS WRIGHT TREMAINE LLP

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

Mary Valdez,  
Plaintiff,  
v.  
J.P.Morgan Chase Bank, N.A.,  
Defendant.

Case No. 2:20-cv-02033-KJM-JDP

**SECOND STIPULATION  
BETWEEN JPMORGAN CHASE  
BANK, N.A. AND MARY VALDEZ  
TO EXTEND CHASE'S TIME TO  
RESPOND TO THE COMPLAINT  
AND ORDER**

NEW RESPONSE DATE: January 11,  
2021

DAVIS WRIGHT TREMAINE LLP

Plaintiff Mary Valdez filed this action on October 12, 2020. Ms. Valdez served Defendant JPMorgan Chase Bank, N.A. on October 13, 2020, making Chase's response due on November 3, 2020. Based upon the allegations in the Complaint, Chase requested and Ms. Valdez initially granted Chase until December 1, 2020 to investigate the claims, evaluate early settlement, and determine its response to the Complaint. The parties have preliminarily discussed settlement and believe that they may be able to reach resolution without further filings and Court proceedings if Chase has additional time to answer.

The parties stipulate under Local Rule 144, with the Court's approval, that Chase's time to respond to the Complaint is extended 41 days to January 11, 2021. This is the second extension Ms. Valdez has granted to Chase. The extension will not affect any other date in the case.

IT IS SO STIPULATED.

DATED: November 23, 2020

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: /s/ Joseph E. Addiego III

Joseph E. Addiego III

Frederick A. Haist

Attorneys for JPMorgan Chase Bank,  
N.A.

DATED: November 23, 2020

MARTIN & BONTRAGER, APC

By: /s/ G. Thomas Martin, III

G. Thomas Martin, III

Nicholas J. Bontrager

Attorneys for Mary Valdez

# ORDER

IT IS SO ORDERED.

DATED: November 30, 2020

  
CHIEF UNITED STATES DISTRICT JUDGE